Bruce J. Zabarauskas
Texas Bar No. 24095654
Holland & Knight LLP
1722 Routh Street, Suite 1500
Dallas, Texas 75201
214-969-1700 – Telephone
214-969-1752 – Facsimile
bruce.zabarauskas@hklaw.com

Attorneys for Wells Fargo Bank, National Association as Trustee for Morgan Stanley Capital I Trust 2019-L2 for the benefit of the Commercial Mortgage Pass-Through Certificate Holders

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:

S
Case No. 22-30681-hdh11

S
NB HOTELS DALLAS, LLC,

S
Debtor.

S
Debtor.

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that Holland & Knight LLP appears on behalf of Wells Fargo Bank, National Association as Trustee for Morgan Stanley Capital I Trust 2019-L2 for the benefit of the Commercial Mortgage Pass-Through Certificate Holders pursuant to Section 1109(b) of Title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and hereby submits this notice of appearance, requests notice of all hearings and conferences herein, and makes demand for service of all papers herein, including all papers and notices pursuant to Rules 2002, 3017, and 9007 of the Bankruptcy Rules. All notices given or required to be given in this case shall be served upon:

Bruce J. Zabarauskas Holland & Knight LLP 1722 Routh Street, Suite 1500 Dallas, Texas 75201 Telephone: 214-969-2511

e-mail: bruce.zabarauskas@hklaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules and Section 1109(b) of the Bankruptcy Code, but, without limitation, the schedules, statements of financial affairs, operating reports, pleadings, motions, applications, complaints, demands, hearings, requests or pleadings, and disclosure statement, any letter, objections, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, electronic mail, telephone, telegraph, telex or otherwise filed or delivered to the Bankruptcy clerk, Clerk, Court or judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to this bankruptcy case and any proceeding related thereto, as well as the property of the Debtor.

PLEASE TAKE FURTHER NOTICE that neither this Notice nor any later appearance, pleading, proof of claim, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this notice, and (v) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any

agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 19, 2022.

Respectfully submitted,

HOLLAND & KNIGHT LLP

By: <u>/s/ Bruce J. Zabarauskas</u>
Bruce J. Zabarauskas

1722 Routh Street, Suite 1500 Dallas, Texas 75201 214-969-1700 – Telephone 214-969-1752 – Facsimile bruce.zabarauskas@hklaw.com

Attorneys for Wells Fargo Bank, National Association as Trustee for Morgan Stanley Capital I Trust 2019-L2 for the benefit of the Commercial Mortgage Pass-Through Certificate Holders